

April Upchurch Fredrickson, OSB #132027  
[april.fredrickson@jacksonlewis.com](mailto:april.fredrickson@jacksonlewis.com)  
Anthony Copple, OSB #163651  
[anthony.copple@jacksonlewis.com](mailto:anthony.copple@jacksonlewis.com)  
JACKSON LEWIS P.C.  
200 SW Market St., Ste. 540  
Portland, Oregon 97201  
Telephone: (503) 229-0404  
Facsimile: (503) 229-0405  
Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

C.T.,

Plaintiff,

vs.

JASON FOSBERG, an individual; RED  
ROBIN INTERNATIONAL, INC., a Nevada  
corporation,

Defendants.

Case No.: 3:22-cv-00637

**DECLARATION OF ANTHONY P.  
COPPLE IN SUPPORT OF THE  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO RESPOND  
TO PLAINTIFF'S MOTION TO  
REMAND**

I, Anthony P. Copple, hereby declare:

1. I am an attorney employed by the law firm Jackson Lewis P.C., attorneys of record for Defendants Red Robin International, Inc. and Jason Fosberg. I have personal knowledge of the matters set forth below and if called to testify, I would testify as follows:

2. The parties request an additional ten days to respond to Plaintiff's Motion to Remand, until June 24, 2022.

3. This is the first request for an extension of time to file a Response to Plaintiff's Motion to Remand.

4. This request is not made for the purpose of delay. The Motion to Remand includes a variety of allegations the additional time is needed to respond to the Motion to Remand. In addition, Defendants need additional time to respond because counsel for Defendants, April Upchurch Fredrickson, had a prescheduled vacation and will thus require additional time to respond to the Motion to Remand.

5. Opposing counsel has agreed to stipulate to the extension of time for Defendants to file their response.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

DATED: June 10, 2022.

s/ Anthony Copple  
Anthony P. Copple, OSB #163651

**DECLARATION OF SERVICE**

I hereby certify that I served the foregoing **DECLARATION OF ANTHONY P. COPPLE IN SUPPORT OF THE UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION TO REMAND** via:

- ☐ Electronic Mail
- ☐ US Postal Service
- ☒ CM/ECF
- ☐ Facsimile Service
- ☐ Hand Delivery
- ☐ UPS

as follows on the date stated below:

Gregory Kafoury, OSB #741663  
[Kafoury@kafourymcdougal.com](mailto:Kafoury@kafourymcdougal.com)  
Jason Kafoury, OSB #091200  
[jkafoury@kafourymcdougal.com](mailto:jkafoury@kafourymcdougal.com)  
Adam Kiel, OSB #091231  
[kiel@kafourymcdougal.com](mailto:kiel@kafourymcdougal.com)  
Kafoury & McDougal  
411 SW 2<sup>nd</sup> Ave., Ste. 200  
Portland, OR 97204

*Attorneys for Plaintiff*

DATED this 10<sup>th</sup> day of June, 2022.

By: s/ Delores Petrich  
Delores Petrich

4866-7688-5540, v. 1